

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF K.H.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, K.H. declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I have lived in Spokane Washington for most of my life. I am currently living in
5 Spokane with my husband. We have five kids, ages 15, 18, 23, 26 and 34 years old.

6 3. I am a massage therapist, and my husband is a retired Army veteran. Our oldest
7 daughter lives in North Dakota; our 26-year-old son works in construction; our 23-year-old son
8 graduated from Yale and is currently working on a ranch in Washington; our 18-year-old
9 daughter attends art school in Boston and our 15-year-old daughter is a freshman in high school.

10 4. N.P. is our 18-year-old daughter and is transgender. I have chosen to refer to her
11 in this declaration as N.P. because I am fearful for her safety and privacy in the current political
12 climate. N.P. currently attends art school in Boston, which she loves. She has found a supportive
13 social group and is doing well. When she was born, she was assigned male at birth, but her
14 gender identity is female.

15 5. As far back as I can remember, N.P. liked girly things. She would wear her
16 pajama bottoms on her head like long hair and was attracted to traditional girly things like
17 butterflies and princesses. Because she had two older brothers, she often wore their hand-me-
18 down clothes, which we learned later caused her great distress. During this time, we thought that
19 maybe she was gay, but she did not want to talk about it. I did not push her one way or the other.

20 6. When N.P. started middle school, it was during COVID, and it was a very
21 difficult time. She was shut down and angry. She was already suffering through being isolated
22 because of COVID. I assumed she was struggling with her identity. I had thought she might be
23 gay because she was flamboyant in her mannerisms and liked girly things. We tried going to a
24 therapist that was skilled in working with LGBTQ+ youth, but N.P. was not ready. N.P. was still
25 going by the name they were assigned at birth and using he/him pronouns. I told the therapist
26 that I just wanted N.P. to tell me who they are. The therapist told us to give them time, to create

1 a space and let them come to you.

2 7. Once school was in-person again, we noticed that N.P. was wearing more
3 feminine clothes. This time was not easy for N.P. though. She was struggling with deep feelings
4 and starting puberty. She often would stay in her room and was very angry. At the time I did not
5 know what was wrong and was very worried about her.

6 8. When N.P. started high school, she asked me if I would take her shopping for
7 makeup, which I did. She also grew her hair out. During the summer before her senior year, N.P.
8 shared with us that she felt like she was in the wrong body. She said that any time someone
9 would refer to her as a boy or a man she would cringe inside. She told us that she wanted to go
10 to therapy to see if what she was feeling was real, and she wanted to go through this process
11 “correctly.” At first, she saw her therapist two times a week and then gradually reduced to once
12 a month. The positive impact was almost immediate. Working with a gender-affirming therapist
13 helped normalize N.P.’s experience and sense of who she is.

14 9. After about four months of therapy, N.P. said that she wanted to talk with her
15 doctor. At that time, she was still seeing her pediatrician at Providence, who was wonderful.
16 However, her doctor told us that since Providence is a catholic hospital, N.P. would not be able
17 to get gender-affirming care there. This is when N.P. started seeing a gender-affirming physician
18 at CHAS in Spokane.

19 10. N.P. began seeing the gender-affirming physician in December 2023. Her
20 physician was very supportive and after doing the appropriate testing, started N.P. on puberty
21 blockers. It was during this time that N.P. started using she/her pronouns. After that she started
22 using an estrogen patch. Now N.P. is on puberty blockers and a weekly estrogen injection.

23 11. Once N.P. started receiving gender- affirming care there was a huge difference in
24 her demeanor. Since beginning hormone treatments, she has become comfortable with her new
25 identity and is thriving as this new person. She has become so much happier and has been able
26 to come out of her shell and build a supportive social network. I cannot express enough how

1 much peace it finally brings her father and myself to see her blossoming into an incredible
 2 woman. Her confidence now is awe inspiring. I believe that if she had not had access to this kind
 3 of care, or the support of her family, she would not be alive. She has intimated that if we had not
 4 been so supportive and allowed her to transition, she would not be here. She explained how
 5 extremely unhappy she had been and depressed in this body that did not reflect who she truly is.

6 12. N.P. is in a much better place now. She is happy at art school in Boston and has
 7 changed her name. Unfortunately, we ran out of time to get her gender markers changed on her
 8 driver's license and with social security before the new administration. We also did not have
 9 time to apply for a passport. Now we are worried about starting that process.

10 13. N.P. has shared recently that early on, when she was younger, she did not have
 11 the language for how she was feeling. She just felt like she did not fit in, not in her own body or
 12 with her family and friends. She did not look like her siblings or other kids. Now that she has
 13 started receiving gender- affirming care, she is able to be her authentic self and participate in her
 14 life more fully. She saw a future for herself and began planning. The change has been dramatic
 15 and incredible. However, when she came home to Spokane from school over Christmas break,
 16 after the election, she said that she did not feel welcome. She described getting weird looks at
 17 the airport. It broke my heart.

18 14. After the last few years of progress and seeing our daughter's happiness and
 19 ability to live as her authentic self, the new Executive Order (EO) threatening access to
 20 gender-affirming care for minors is having an immediate negative effect on our daughter and our
 21 family. I am terrified to think about the possibility that the care my daughter receives could be
 22 interrupted or discontinued. I ask myself how much can one person take? If they take away health
 23 care and your identity what else do you have? We recently had a conversation with N.P.'s doctor
 24 about this and she stated that healthcare access is a civil right, and she would do what she could
 25 to maintain continuity of care for her patients. I am trying not to let N.P. see how scared I am for
 26 her.

1 15. N.P. has plans to get facial feminization surgery and top surgery sometime in the
 2 future, and now that is in jeopardy. N.P. is terrified about losing access to the care she is currently
 3 receiving. She worries about how her body would start to change if her treatment was interrupted
 4 and what that would do to her mental and physical health. She has said she would leave the
 5 country to get the care she needs and to feel safe if she had to. But we are worried she would not
 6 be able to get her passport in her preferred gender, or at all.

7 16. Since the election I have been in fight or flight mode. As her mother, I worry
 8 about what would happen if her treatment was interrupted and her appearance started to change.
 9 She deserves to live a long healthy life without always looking over her shoulder for yet another
 10 threat. Transgender people are already targets for harassment and violence in the current political
 11 climate. I worry constantly for her safety. If she were no longer able to “pass” the risk to her
 12 safety would increase. I worry about depression and self-harm. I worry about all the other
 13 families and transgender or gender expansive people out there who are afraid or are targets.

14 17. It is not an option for us to sue the Federal Government directly. I have already
 15 lost friends, family and clients and I could not put the rest of my family at risk of retaliation if
 16 we were to be in the public eye as plaintiffs. I would not want to risk outing N.P. at school and
 17 putting a target on her or our other children.

18 I declare under penalty of perjury under the laws of the State of Washington and the
 19 United States of America that the foregoing is true and correct.

20 DATED and SIGNED this ____ day of February 2025 at _____, Washington.

21
 22 _____
 23 K.H.
 24 Parent of N.P.
 25
 26

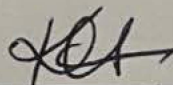
15. N.P. has plans to get facial feminization surgery and top surgery sometime in the future, and now that is in jeopardy. N.P. is terrified about losing access to the care she is currently receiving. She worries about how her body would start to change if her treatment was interrupted and what that would do to her mental and physical health. She has said she would leave the country to get the care she needs and to feel safe if she had to. But we are worried she would not be able to get her passport in her preferred gender, or at all.

16. Since the election I have been in fight or flight mode. As her mother, I worry about what would happen if her treatment was interrupted and her appearance started to change. She deserves to live a long healthy life without always looking over her shoulder for yet another threat. Transgender people are already targets for harassment and violence in the current political climate. I worry constantly for her safety. If she were no longer able to "pass" the risk to her safety would increase. I worry about depression and self-harm. I worry about all the other families and transgender or gender expansive people out there who are afraid or are targets.

17. It is not an option for us to sue the Federal Government directly. I have already lost friends, family and clients and I could not put the rest of my family at risk of retaliation if we were to be in the public eye as plaintiffs. I would not want to risk outing N.P. at school and putting a target on her or our other children.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED and SIGNED this 4 day of February 2025 at Spokane, Washington.



K.H.
Parent of N.P.